

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

KIDANEMARIAM KASSA,

Plaintiff,

vs.

**FULTON COUNTY, GEORGIA,
PAUL H. HOWARD, officially &
individually,
ANTIONETTE STEPHENSON,
individually,
PIERRE EASLEY, individually, and
JOHN DOE, officially & individually,**

Defendants.

CIVIL ACTION FILE NO.

1:17-CV-02068-AT

JURY TRIAL REQUESTED

**PLAINTIFF’S RESPONSE TO DEFENDANT PIERRE EASLEY’S
SPECIAL APPEARANCE MOTION TO DISMISS PURSUANT TO
FED.R.CIV.P. 12(b) (2), 12 (b) (5) AND (12 (b) (6)**

COMES NOW PLAINTIFF KIDADEMARIAM KASSA (“Plaintiff”) and
by and through his undersigned counsel of record and files this RESPONSE TO
DEFENDANT PIERRE EASLEY’S SPECIAL APPEARANCE MOTION TO
DISMISS PURSUANT TO FED.R.CIV.P. 12(b) (2), 12 (b) (5) AND (12 (b) (6).

Plaintiff respectfully requests that this Honorable Court DENY Defendant
Easley’s Motion, FINDS that service of process on Defendant was sufficient and
that other claims of Defendant are moot due to the filing of Plaintiff’s First
Amended Complaint for Damages after the filing of Defendant’s motion.

Respectfully submitted this 27th day of October, 2017.

/S/TIFFANY WILLIAMS ROBERTS

Tiffany Williams Roberts

Bar No. 791208

235 Peachtree Street, Suite 400

Atlanta, Georgia 30303

(404) 287-2090 – telephone

(678) 965-1790 –facsimile

troberts@tiffanywroberts.com

CERTIFICATION

Counsel for Plaintiff certifies that the foregoing Complaint complies with the font and point size requirements of Local Rule 5.1 (C).

/S/TIFFANY WILLIAMS ROBERTS

Tiffany Williams Roberts

Bar No. 791208

191 Peachtree Street, Suite 3300

Atlanta, Georgia 30303

(404) 287-2090 (t); (678) 965-1790 (f)

troberts@tiffanywroberts.com

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

KIDANEMARIAM KASSA,

Plaintiff,

vs.

**FULTON COUNTY, GEORGIA,
PAUL H. HOWARD, officially &
individually,
ANTIONETTE STEPHENSON,
individually,
PIERRE EASLEY, individually, and
JOHN DOE, officially & individually,**

Defendants.

CIVIL ACTION FILE NO.

1:17-CV-02068-AT

JURY TRIAL REQUESTED

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 27, 2017, I have electronically filed the foregoing PLAINTIFF'S RESPONSE TO DEFENDANT EASLEY'S APPEARANCE MOTION TO DISMISS & BRIEF IN SUPPORT with the Clerk of Court using the CM/ECF system which will provide electronic notification to the following attorney of record:

Ashley J. Palmer
OFFICE OF THE FULTON COUNTY ATTORNEY
141 Pryor Street, S.W., Suite 4038
Atlanta, Georgia 30303
(404) 612-0246 (office); (404) 730-6324 (facsimile)

This the 27th day of October, 2017.

/S/TIFFANY WILLIAMS ROBERTS

Tiffany Williams Roberts

Bar No. 791208

235 Peachtree Street, Suite 400

Atlanta, Georgia 30303

(404) 287-2090 – telephone

(678) 965-1790 –facsimile

troberts@tiffanywroberts.com